

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

KYSS BURTON, BY HER MOTHER,
SAKIA HALL AS NEXT FRIEND AND
SAKIA HALL,

Plaintiffs,

v.

Case No. 3:11-cv-00065-JRS

HAROLD FORD,

Defendant.

MOTION TO COMPEL

COMES NOW the defendant, by counsel, pursuant to Rule 37(a) of the Federal Rules of Civil Procedure, and moves to compel the plaintiff to file Initial Disclosures, to provide complete and executed Answers to Interrogatories and Responses to Request for Production of Documents which were served upon him on or about March 30, 2011, and to sit for a deposition. Defendant hereby incorporates his Brief in Support of the Motion to Compel as if fully set forth herein. Defendant has in good faith conferred with counsel for the plaintiff in an effort to obtain the Initial Disclosures, discovery responses and to take the deposition without court action.

WHEREFORE, the defendant respectfully requests this Court to enter an Order compelling the plaintiff to provide Initial Disclosures, complete Answers to Interrogatories, executed under oath, and Responses to Request for Production of Documents, to sit for their depositions, and if these items are not completed by May 20, 2011, to award the defendant his costs and expenses incurred in bringing this Motion.

HAROLD FORD

By Counsel

/s/

David P. Corrigan
VSB No. 26341
Attorney for Harold Ford
Harman, Claytor, Corrigan & Wellman
P.O. Box 70280
Richmond, Virginia 23255
(804) 747-5200
(804) 747-6085 – facsimile
dcorrigan@hccw.com

CERTIFICATE

I hereby certify that on the 17th day of May, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Robert H. Smallerberg, Esq.
Metropolitan Law Center, PLC
10035 Sliding Hill Road, Suite 204
Ashland, VA 23005

Brian K. Telfair, Esq.
City of Richmond
Office of the City Attorney
900 E. Broad Street, Room 300
Richmond, VA 23219

/s/

David P. Corrigan
VSB No. 26341
Attorney for Harold Ford
Harman, Claytor, Corrigan & Wellman
P.O. Box 70280
Richmond, Virginia 23255
(804) 747-5200
(804) 747-6085 – facsimile
dcorrigan@hccw.com